

Direct Testimony of Jim Grevatt

Docket No. 2021-361-G

CCL/SACE Exhibits JG-1 – JG-8

Jim Grevatt

Managing Consultant



Professional Summary

Jim Grevatt has 30 years of experience in energy efficiency program planning and operations. At Energy Futures Group Jim has advised regulators, program implementers, and advocates in Florida, Louisiana, West Virginia, Colorado, Nevada, British Columbia, Manitoba, Maryland, Pennsylvania, Delaware, Virginia, New Jersey, Illinois, Iowa, Indiana, Mississippi, North Carolina, South Carolina, California, Vermont, Maine, Kentucky, and New Hampshire, and has provided expert witness testimony in fourteen of those jurisdictions. Jim has hands-on experience with industry-leading approaches to designing and managing energy efficiency programs, including multi-family, low income, residential retrofit, new construction, HVAC, and efficient products programs. His in-depth knowledge of program operations and clear understanding of strategic thinking and planning ensure that programs achieve their desired market impacts. Throughout his career, Jim has focused on building strong relationships with staff, peers, trade allies, regulators, and clients as the best way to understand the needs and challenges that each sector faces. In past leadership roles at Efficiency Vermont, the DCSEU, and Vermont Gas, Jim had overall responsibility both for program design and operations. He was responsible for finding successful consensus approaches among diverse groups of partners and stakeholders, and for policy interactions with regulators, assuring that program processes were efficient and effective.

Experience

2013-present: Managing Consultant, Energy Futures Group, Hinesburg, VT

2012-2013: Director, Targeted Implementation, Vermont Energy Investment Corp., Burlington, VT

2011-2012: Director, Residential Energy Services, District of Columbia Sustainable Energy Utility
for Vermont Energy Investment Corp., Washington, D.C. and Burlington, VT

2010-2012: Managing Consultant, Vermont Energy Investment Corporation, Burlington, VT

2005-2010: Director, Residential Services, Vermont Energy Investment Corp., Burlington, VT

2001-2005: Manager, Energy Services, Vermont Gas Systems, S. Burlington, VT

1998-2001: Manager, Residential Energy Services, Vermont Gas Systems, S. Burlington, VT

1996-1998: Manager, HomeBase Retrofit Program, Vermont Gas Systems, S. Burlington, VT

1994-1996: Technical Specialist, Vermont Gas Systems, S. Burlington, VT

1991-1994: Associate Director and Technical Specialist, Champlain Valley Weatherization Program, Burlington, VT

Education

B.F.A., University Honors, University of Illinois, 1982

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Selected Projects

- **Appalachian Voices.** Provided expert witness testimony in Virginia Electric and Power Co.'s application for approval of its 2021 DSM Update. (2022)
- **Natural Resources Defense Council and Sierra Club.** Provided expert witness testimony in Tri-State Generation and Transmission Association's 2020 Electric Resource Plan Proceeding. (2021)
- **West Virginia Citizens Action Group, Solar United Neighbors, and Energy Efficient West Virginia.** Provided expert witness testimony in Monongahela Power Company and the Potomac Edison Company Petition and General Investigation to Determine Reasonable Rates and Charges (2021)
- **Natural Resources Defense Council and Sierra Club.** Provided expert witness testimony in Public Service Company of Colorado's 2021 Electric Resource Plan and Clean Energy Plan proceeding. (2021)
- **Natural Resources Defense Council, Sierra Club, and Southwest Energy Efficiency Project.** Provided expert witness testimony to the Public Utility Commission of Nevada regarding the Application of Southwest Gas Corporation for Approval of a Conservation and Energy Efficiency Plan for the Years 2022, 2023 and 2024. (2021)
- **Energy Efficient West Virginia, West Virginia Citizen Action Group, and Earthjustice.** Provided expert witness testimony in Appalachian Power Company and Wheeling Power Company's Petition regarding EE/DR program approvals. (2021)
- **Appalachian Voices.** Provided expert witness testimony in Virginia Electric and Power Co.'s EM&V proceeding and its application for approval of its 2020 DSM Update. (2021)
- **The South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Sierra Club, and Natural Resources Defense Council.** Provided expert witness testimony critiquing the market potential study used in Duke Energy Carolinas and Duke Energy Progress 2020 Integrated Resource Plans. (2021)
- **The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA").** Provided expert witness testimony in support of robust low income efficiency programs in Philadelphia Gas Works Petition for Approval of Demand-Side Management Plan and PECO, Duquesne, and First Energy Act 129 Phase IV Plan proceedings. (2020-2021)
- **Appalachian Voices and Natural Resources Defense Council.** Provided expert witness testimony in Virginia Electric and Power Co. Phase VIII DSM Program Application. (2020)
- **Citizens Action Coalition of Indiana.** Provided expert witness testimony in Duke Energy Indiana 2020-2023 DSM Plan. (2020)
- **The Consumers' Association of Canada (Manitoba) and Winnipeg Harvest.** Provided expert witness testimony in the Efficiency Manitoba 2020/23 Efficiency Plan proceeding. (2019-2020)

- **British Columbia Sustainable Energy Association.** Provided expert review, discovery, and evidence in DSM-related aspects of multiple proceedings with Fortis BC, BC Hydro, and FEI. (2017-2020)
- **Southern Environmental Law Center.** Provided technical support to environmental and social justice advocates in the Carolinas, and ongoing participation in the Duke Energy EE Collaborative (2019-2020) and Dominion South Carolina EE Advisory Group, as well as technical support for SELC staff regarding pre-pay programs and other policy issues. (2015-2022).
- **Coalition of Maryland Energy Efficiency Advocates.** Prepared written comments and multiple appearances before the Commission to present evidence regarding Maryland utilities' 2015-2017, 2018-2020, and 2021-2023 EmPOWER Maryland energy efficiency plans, and in additional proceedings related to utility goal setting, cost-effectiveness testing, best-practices in low-income programs, and energy efficiency financing. (2014-2022)
- **Southern Alliance for Clean Energy and Earthjustice.** Provided expert witness testimony in the Florida Energy Efficiency and Conservation Act goal setting proceeding. (2019)
- **Energy Efficient West Virginia, West Virginia Citizen Action Group, and Earthjustice.** Provided expert witness testimony in Appalachian Power Company and Wheeling Power Company's Petition regarding EE/DR program approvals. (2019)
- **Alliance for Affordable Energy and Natural Resources Defense Council.** Provided expert technical support for Louisiana Public Service Commission EE Rulemaking and Entergy New Orleans DSM Plan. (2019-2021)
- **New Jersey Clean Energy Program.** Planning support for NJCEP implementation team. Facilitated focus groups, worked with Board of Public Utilities Staff, program administrators, utility companies, and other stakeholders to identify opportunities to improve NJCEP strategic direction and increase benefits for ratepayers. Lead author drafting strategic plan. (2015-2020)
- **Natural Resources Defense Council and Sierra Club.** Provided expert witness testimony in Public Service Company of Colorado's Strategic Issues, 2019-2020 DSM Plan, and 2021-2022 DSM Plan proceedings. (2017-2020)
- **Natural Resources Defense Council and Sierra Club.** Provided expert witness testimony in Nevada Energy Company's 2019-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan, and 2019 and 2020 DSM Update proceedings and participated in stakeholder collaboratives. (2018-2021)
- **Environmental Law & Policy Center and Iowa Environmental Council.** Provided expert witness testimony in DSM proceedings regarding MidAmerican Energy Company's and Interstate Power and Light's 2019-2023 Energy Efficiency Plans. (2018)
- **Pueblo County Colorado.** Provided expert witness testimony in DSM proceedings regarding Black Hills Energy Company's 2019-2021 DSM Plan. (2018)
- **Sierra Club.** Provided expert witness testimony in proceedings regarding Kentucky Power Company's DSM programs and cost-effectiveness. (2017-2018)
- **California Alternative Energy and Advance Transportation Financing Authority.** Provide technical assistance on development of commercial energy efficiency financing pilot. (2017-2019)

- **Energy Efficiency for All.** Expert technical support for affordable multifamily energy efficiency advocacy in Pennsylvania and Virginia. Worked with a coalition of energy efficiency and affordable housing advocates to shape advocacy efforts with utilities and regulators. (2015-2020)
- **Regulatory Assistance Project.** Researched and co-authored with Chris Neme: The Next Quantum Leap in Efficiency: 30 Percent Electric Savings in Ten Years, addressing program and policy questions related to doubling the best efficiency program results. (2016)
- **Natural Resources Defense Council.** Provided expert witness testimony in support of NRDC's intervention in Ameren Illinois' 2014-2016 energy efficiency plan. Testimony demonstrated that Ameren would be capable of capturing significantly greater efficiency savings than it had proposed. (2013)
- **Regulatory Assistance Project.** Expert technical support for DSM in China. Worked with various government agencies and grid companies, as well as advocacy organizations to provide technical support related to advancing DSM and energy efficiency in China. (2015)
- **Vermont Public Service Department.** Evaluation of Clean Energy Development Fund. Conducted interviews of staff and key stakeholders under contract to NMR and prepared memo outlining process findings and recommendations. (2014-2015)
- **Evaluation of Efficiency Maine Low-Income Multi-Family Weatherization Program.** Responsible for program staff and building owner interviews and process evaluation under contract to NMR and Efficiency Maine. (2014-2015)
- **Northeast Energy Efficiency Partnerships.** Researched and co-authored meta-study of the use of energy efficiency to defer T&D investments. (2014)
- **Northeast Energy Efficiency Partnerships-** Researched and co-authored meta-study of ductless heat pump performance and market acceptance. (2014)
- **New Hampshire Electric Co-op.** Conducted assessment of the co-op's environmental and social responsibility programs' promotion of whole building efficiency retrofits, cold climate heat pumps and renewable energy systems. Presented recommendations to the co-op Board. (2014)
- **High Meadows Fund.** Co-authored a study assessing the market viability of "High Performance Homes" in Vermont. (2014)
- **Energy Savings Potential Study, Delaware Department of Natural Resources.** Led narrative development for the residential programs for a study of the energy efficiency savings potential in Delaware. (2013-2014)
- **Regulatory Assistance Project.** Provide technical support to energy efficiency advocates in proceedings in Maryland, Mississippi, and Missouri. (2013-2017)
- **Better Buildings Solutions Center, U. S. Department of Energy.** Energy Futures Group's lead author in drafting and reviewing web content for ten how-to "handbooks" detailing proven approaches to designing and implementing residential retrofit efficiency programs. (2013-2014)
- **Utility Program Benchmarking.** Led research on behalf of a large IOU to compare the cost of saved energy across ~10 leading utility portfolios. The research sought to determine if there are discernable differences in the cost of saved energy related to utility spending in specific non-incentive categories, including administration, marketing, and EM&V. (2013)

- **Research on trends in multi-family, HVAC, and new construction programs.** Developed an analysis of emerging program trends on behalf of a leading energy efficiency industry firm. (2013-2014)
- **Efficiency Power Plant, Regulatory Assistance Project.** Partnered with RAP to develop a demonstration tool to show how energy efficiency measures can be used to mitigate air quality impacts related to power production. (2013)
- **Natural Gas Energy Efficiency Analysis, the Green Energy Coalition.** Provided analytical support to demonstrate in testimony that Enbridge Gas could reduce the scale of its proposed pipeline expansion by implementing aggressive energy efficiency programs. (2013)
- **Targeted Implementation, VEIC.** Responsible for market analysis and strategic planning for a new division expanding VEIC's energy efficiency program implementation projects. (2012-2013)
- **DC Sustainable Energy Utility.** Led the planning and startup implementation of Residential programs for the DC SEU, including single and multi-family and retail market programs. Led the development of the initial portfolio-level Annual Plan. Led client and partner interactions around planning and policy development. Member of DC SEU Senior Management Team. (2011-2012)
- **EmPOWER Maryland Critical Program Review.** Expert consultant to the Maryland Office of Peoples' Counsel in EmPOWER Maryland hearings regarding utility energy efficiency planning and reporting. Represented the OPC in stakeholder meetings that informed the current 2012-2014 EmPOWER plans. Multiple appearances before the Maryland Public Service Commission. (2010-2012)
- **Efficiency Vermont 20 year Forecast of Efficiency Potential.** Senior Advisor in developing the forecast scenarios that led to significantly increased efficiency investment in Vermont. (2010-2011)
- **Efficiency Vermont Residential Programs.** Directed 100% growth in program budgets to nearly \$10M annually. Responsible for strategic direction, leadership, and results for Efficiency Vermont's award-winning residential retrofit, new construction, retail, and low-income programs. Supported excellence in a staff of 30. (2005-2010)
- **Vermont Gas Systems Efficiency Program Leader.** Directed strategic planning and program operations that led to six programs and portfolio as a whole being recognized as exemplary in Responding to the Natural Gas Crisis: America's Best Natural Gas Energy Efficiency Programs (ACEEE, 2003). Built contractor infrastructure and internal support to consistently meet program objectives. Led development of Annual Reports, planning and budgeting. Collaborated with Efficiency Vermont staff to develop a fuel-blind, state-wide, jointly offered residential new construction program. (2001-2005)
- **Residential Retrofit Program Development.** Enhanced design and performance of VGS' residential retrofit offerings by streamlining delivery and building strong relationships with contractors, homeowners, and property managers. (1994-2005)
- **Demonstrated Technical Excellence in Approaches to Residential Retrofits.** Conducted hundreds of residential energy audits and quality assurance inspections for natural gas and alternative-fueled homes. Trained and coached installers to obtain desired quality. Worked to satisfy homeowners through explanation, education, sound listening to concerns, and ultimately assuring that concerns were addressed. Trained new staff in auditing techniques. (1991-1998)

Selected Presentations

Small Steps in Coordination Equal Leaps and Bounds for Pennsylvania's Underserved Families: Driving Policy Improvements through Collaborative Advocacy- ACEEE 2018 Summer Study on Energy Efficiency in Buildings, August, 2018

Keys to the House: Unlocking Residential Savings with Program Models for Home Energy Upgrades- ACEEE 2016 Summer Study on Energy Efficiency in Buildings, August, 2016

Home Upgrade Program Design & Implementation Models for Acquiring Savings in Multiple Climate Zones- 2016 National Home Performance Conference, April, 2016

EERS Advancements in Maryland: EmPOWER After 2015- Presentation at ACEEE Energy Efficiency as a Resource Conference, September, 2015

Leveling the Playing Field for Distributed Energy Resources- Panelist discussing the use of energy efficiency to defer T&D investments, Acadia Center forum on Envisioning Our Energy Future, February, 2015

Residential Retrofit Programs: What's Working? Perspectives from National Program Leaders- Panelist at AESP National Conference 2012

Elements of Retrofit Program Incentive Design- DOE Technical Assistance Program Publication, April, 2011

Designing Effective Incentives to Drive Residential Retrofit Participation- DOE Technical Assistance Program Webinar, October, 2010

Quality Assurance for Residential Retrofit Programs- DOE Technical Assistance Program Webinar, October, 2010

Home Performance with ENERGY STAR, Quality Assurance in Vermont- Panelist at the ACI Home Energy Retrofit Summit, April 2010

Delivering on the Promise-Engaging Communities and the Public- Panelist at 2010 NEEP Summit, March, 2010

Home Performance with Energy Star in Vermont - Presentation at CEE Member meeting, June 2009

Leading by Example: Exemplary Low Income Energy Efficiency Programs –Presented on Efficiency Vermont's Residential low income services at California's Low Income Energy Efficiency Symposium, June 2006

"Natural Gas Efficiency Policies, Responding to the Natural Gas Crisis One Therm at a Time" - Co-presented with Dan York and Anna Monis Shipley of American Council for an Energy-Efficient Economy (ACEEE) -ACEEE/CEE Market Transformation Symposium, 2004

**DOMINION ENERGY SOUTH CAROLINA, INC.
SOUTH CAROLINA COASTAL CONSERVATION LEAGUE AND
SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
FIRST DATA REQUEST
DOCKET NO. 2021-361-G**

REQUEST NO. 1-7:

The Company states that it will “leverage existing NEEP infrastructure to cost-effectively administer the expansion of this program because the Company will be able to simultaneously provide the proposed gas offerings and the electric NEEP offerings using the same implementation contractor.” Application at pp. 8-9.

a. Has the Company conducted any analyses of the potential benefits and cost-effectiveness of a co-funded electric and gas “comprehensive home-retrofit” EE program that would focus on building shell improvements such as insulation and air sealing, and/or duct sealing and insulation? If yes, please provide the analyses, including fully functional electronic workpapers. If no, why has the Company not conducted such analyses?

RESPONSE NO. 1-7:

a. No. DESC has not completed any analyses on the potential benefits and/or cost-effectiveness of a co-funded electric and gas program. For the proposed program, DESC focused on the expansion of the current NEEP program to natural gas customers.

**DOMINION ENERGY SOUTH CAROLINA, INC.
SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S
FIRST AND CONTINUING REQUEST FOR BOOKS,
RECORDS, AND OTHER INFORMATION
DOCKET NO. 2021-361-G**

REQUEST NO. 1-5:

Provide detailed descriptions of all methodologies employed to develop the costs used in the calculation of *all* cost benefit tests (e.g., TRC, PCT, UCT and RIM) associated with measures that have the potential to produce both electric and gas benefits for participating customers.

RESPONSE NO. 1-5:

Resource Innovations followed standard industry calculations, as documented in the California Standard Practice Manual, to analyze the proposed programs from four standard cost-benefit test perspectives (TRC, PCT, UCT, and RIM). The following table summarizes the costs and benefits applied for each test perspective:

Test	Benefits	Costs
TRC	Avoided natural gas costs	Program administration/management costs
		Incremental measure costs (whether paid by the customer or the utility)
PCT	Natural gas bill reduction over the measure lifetime	Incremental measure costs
	Incentive payments	
UCT	Avoided natural gas costs	Program administration/management costs
		Incentive payments
RIM	Avoided natural gas costs	Program administration/management costs
		Incentive payments
		Lost revenue from reduced sales

For all measures included in the proposed programs, costs utilized in the cost-benefit analysis included incremental measure costs, program incentive payments, and avoided costs, bill reductions, and lost revenue resulting from the lifetime natural gas savings for the measure.

For measures that have the potential to produce both electric and gas benefits for participating customers, the incremental measure costs were pro-rated by the value of the customer's associated electric energy cost savings relative to the customer's natural gas cost savings. No additional cost adjustments were made for measures that produce both electric and gas benefits. However, for the smart thermostat measure it was assumed that the incentive cost would be split between gas and electric.

PERSON RESPONSIBLE: Sheryl Shelton

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REQUEST NO. 1-5:

DESC proposes to offer incentives for high efficiency natural gas equipment including furnaces, water heaters, and direct-vent fireplaces.

- a) Has DESC conducted research into the current market share of the high efficiency equipment for which it proposes to offer rebates? If yes, please provide any and all documentation of this research and its findings and conclusions. If no, what is the basis of DESC's assumptions regarding the incremental savings and net-to-gross ratios for the equipment for which it proposes rebates? Please provide documentation for each assumption.
- b) Please provide any and all documentation, analyses, and reports referenced by the Company in designing its programs regarding the typical baseline gas equipment that customers are installing in the absence of a rebate program for high efficiency gas equipment, with cites and notations indicating the basis of the Company's assumptions.
- c) Please provide the requested data for the proposed residential and commercial programs.

RESPONSE NO. 1-5:

- a) No. DESC did not conduct research into the existing market share for high efficiency gas equipment. Incremental savings have been calculated on a gross basis, meaning no net-to-gross ratios have been applied. To establish the incremental savings, Resource Innovations has provided the baseline equipment details in DESC's Response to CCL SACE Request No. 1-10.
- b) Please see Response to CCL SACE Request No. 1-10.
- c) Please see Response to CCL SACE Request No. 1-10.

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REQUEST NO. 1-9:

Exhibit B, page 1 of 4 includes a table labeled "Gross Savings (therms)."

- a) Please provide a similar table showing net savings by program, by year.
- b) Please provide the net-to-gross values assumed by the Company for each program and include documentation of the basis of those assumptions.

RESPONSE NO. 1-9:

- a) The Company has no information responsive to this request. Measure impacts were only calculated on a gross basis.
- b) The Company has no information responsive to this request. No net-to-gross values were assumed.

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REQUEST NO. 1-4:

Provide an electronic version with all formulas intact, of each spreadsheet utilized to produce all back-up calculations supporting the program tables in Exhibit B filed with the Company's Application.

RESPONSE NO. 1-4:

The program tables in Exhibit B were produced in Resource Innovations' proprietary cost-benefit model. The attached spreadsheet ("Response 1-4 – Program table details.xls") provides supporting program cost estimates and measure impacts with reference data and supporting engineering algorithms, which were utilized in the model to produce the program and portfolio results included in the Company's application.

PERSON RESPONSIBLE: Sheryl Shelton

Smart Thermostat**Mid-Atlantic TRM (v10):**

Cooling Savings = 7.0%
 Heating Savings = 6.0%

ENERGY STAR Furnace Calculator:

	Annual Heating Usage (Therms)		Adjusted Savings
	80% AFUE Furnace	90% AFUE Furnace	
Manual Thermostat	525	467	29.76
Programmable Thermostat	452	401	25.59
Average Savings =			27.68 Therms

Residential Equipment Rebates								
Measures	Minimum Efficiency Requirements	Savings (therms)	Incentive	Incremental Participation				
				Yr1	Yr2	Yr3	Yr4	Yr5
Tier 1 High Efficiency Gas Furnace (90%)	90%+ AFUE	81.0	\$250	419	559	699	699	699
Tier 2 High Efficiency Gas Furnace (95%)	95%+ AFUE	91.0	\$350	461	615	769	769	769
Tier 1 Gas Storage Water Heater	0.64+ UEF	14.1	\$75	20	32	40	40	40
Tier 2 Gas Storage Water Heater	0.80+ UEF	41.4	\$350	21	32	42	42	52
Tier 1 Gas Tankless Water Heater (0.80)	0.80+ UEF	41.4	\$250	161	248	294	294	294
Tier 2 Gas Tankless Water Heater (0.90)	0.90+ UEF	53.5	\$350	108	164	220	220	220
Direct Vent Gas Fireplace	FE ≥ 70% with an electronic pilot ignition	67.0	\$150	50	85	100	100	100
Total Incentives:				\$360,500	\$500,750	\$627,100	\$627,100	\$630,600
Total Program Non-Incentive (Admin, Mgmt, Marketing):				\$73,445	\$63,345	\$71,925	\$71,925	\$72,125
Total Annual Budget:				\$433,945	\$564,095	\$699,025	\$699,025	\$702,725
Total Annual Savings (therms):				92,839	127,762	159,550	159,550	159,964

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REQUEST NO. 1-6:

Regarding each specific high efficiency gas equipment measure, please answer the following questions:

- a. Has the Company conducted any analyses comparing the installation and operating costs of the specified high efficiency natural gas equipment to the installation and operating costs of high efficiency electric equipment? For example, has the Company compared the total life-cycle cost for a 90% AFUE natural gas furnace with a high efficiency electric heat pump? If yes, please provide any such analyses, including workpapers in fully functional electronic format with formulas intact.

RESPONSE NO. 1-6:

- a. No. DESC has not conducted any analyses comparing the installation and operating costs of gas equipment measures to the installation and operating costs of electric equipment. The intent of the proposed programs is to encourage the Company's natural gas customers to replace inefficient natural gas equipment with more efficient natural gas equipment.

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REQUEST NO. 1-4:

Regarding the Company's intent to recover net lost revenues for the proposed natural gas efficiency programs:

- a. Has the Company estimated the amount of net lost revenues it expects to recover if the programs are approved and if they perform as proposed? If yes, please provide the analysis and supporting workpapers in fully functional electronic format with formulas intact. Please provide the information by program, by year.
- b. For how long does the Company expect to recover net lost revenues that result from the implementation of the proposed EE programs?

RESPONSE NO. 1-4:

- a. No. DESC has not estimated the impact of net lost revenues it expects to recover if the programs perform as proposed.
- b. DESC expects that if the programs are approved, as proposed, the net lost revenues will be recovered for the life of the Gas DSM programs. Net lost revenues result from thermal savings experienced by customers due to implementation of Gas DSM programs and, therefore, will exist for the life of the programs.